REMARKS

The Office Action mailed May 19, 2004 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-25 were pending in the application. Claims 1, 2, 19, 24, and 25 have been amended and no claims have been cancelled or newly added. Therefore, claims 1-25 are pending in the application and are submitted for reconsideration.

This amendment changes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

Claims 19 and 20 are rejected under 35 U.S.C. §1.112, second paragraph as being indefinite. In reply, applicant has amended claim 19 to address the issue noted in the office action and submit that the these claims are now in definite form and meet the requirements of 35 U.S.C. §1.112, second paragraph.

In the Office Action, claims 1, 4-6, 10-15, 24, and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,678,867 to Fong et al. (hereafter "Fong"). Claims 2, 3, 7-9, and 16-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong in view of U.S. patent application 2002/0026461 to Kutay et al. (hereafter "Kutay"). Applicant respectfully traverses these rejections for at least the following reasons.

Each of the independent claims 1, 24, and 25 recite a method (or system/software) that, *inter alia*, receives an XML environment and <u>automatically</u> creates a target model and a source model in accordance with predetermined rules with one of the models being an XML model and the other of the models being a flat file or a database model. See pages 9-12 and 13-16 of the specification for examples of predetermined rules that automatically create the claimed source model and target model so that a run file can be created for defining an XML map. Such an automatic creation of both the target model and the source model is <u>not</u> disclosed or suggested by the applied prior art.

Specifically, Fong relates to providing <u>a graphical user interface</u> for <u>interactively</u> mapping between one structured information to another structured information. See Abstract as well as col. 3, line 54 to col. 4, line 10 of Fong. Therefore, there is no teaching or suggestion in Fong of the claimed <u>automatic</u> creation of a target model and a source model

based on predetermined rules after receiving an XML environment. In fact, the _interactive_ mapping taught by Fong _teaches away_ from these claimed features in the independent claims. Therefore, these recited features in the pending independent claims are _not_ disclosed or suggested by Fong.

The deficiencies in Fong are _not_ cured by any of the other applied prior art. Specifically, neither does Kutay disclose or suggest these claimed features. Therefore, the office action fails to make a _prima facie_ of obviousness with respect to the pending independent claims.

The dependent claims are also in condition for allowance for at least the same reasons, as discussed above, as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a _whole_.

For example, claims 2 and 3 recite _automatically_ creating test data for each of a plurality of defining items. See, for example, pages 17-21 of the specification that disclose the rules for automatically generating the test data for each of the plurality of defining items. Such an automated generation of test data is also _not_ disclosed by Kutay. The Office Action cites to Fig. 9B and page 7 of Kutay for disclosing this feature. However, this cited portion only discloses exemplary _interfaces_ to assist a _user_ define information access parameters. See paragraph 104-106 on page 7 of Kutay. Therefore, there is no teaching of the claimed _automatic_ generation of test data. Accordingly, this claimed feature is also not disclosed or suggested by the applied prior art and provides an additional reason for the patentability of these claims.

In view of the foregoing amendments and remarks, applicant respectfully submit that the application is now in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicant hereby petition for any needed extension of time.

Respectfully submitted,

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